REMARKS

Reconsideration of this application is respectfully requested.

Claims 1-50 are pending. Claims 14-50 were withdrawn from consideration by the Examiner. Claims 1-13 were rejected.

Claims 9, 11 and 13 were rejected under 35 U.S.C. § 102(b) as being anticipated by Le Tarte (US 3,455,367). Claim 9 has been amended. Claim 9 recites, "inserting the ventilation cloth into the adhesive with an elongated straight insertion member, the insertion member having a length substantially as long as a length of the screen bar segment." An example of an embodiment of claim 9 is shown in FIG. 32. These embodiments are discussed in paragraph [0278], and include, for example, blades and bands that are substantially as long as the screen bar segments. The claimed insertion member is capable of performing insertion substantially on the full length of a screen bar segment (except the corner keys) in one stroke, which is substantially quicker than rolling. In addition, because the claimed insertion member can be used with a single motion perpendicular to the frame, it has no tendency to squeeze the adhesive towards one end of the frame.

Le Tarte neither discloses nor suggests these features. The Office Action alleges that a heated roller meets the requirement for an elongated insertion member. However, Le Tarte's roller is not substantially as long as a screen bar segment. Le Tarte's insertion device is a roller having a length that is approximately as long as a width of the screen bar segment (FIG. 4), but both the length and diameter of Le Tarte's roller are smaller than a length of the screen bar segment by more than an order of magnitude. Le Tarte's FIG. 1 shows the frame. It is apparent that the length of each screen bar segment is at least an order of magnitude larger than a width of the screen bar segments. Therefore, the rejection of claim 9 should be withdrawn. Claims 11 and 13 are dependent on claim 9, and are not anticipated by Le Tarte for at least the same reasons.

Claims 9, 10 and 13 were rejected under 35 U.S.C. § 102(b) as being anticipated by Insalaco (US 5,238,515). Like Le Tarte, Insalaco teaches the use of rollers as insertion members. Even if the plurality of rollers in Insalaco's device could be considered as an elongated insertion member, Insalaco would not disclose or suggest "the insertion member having a length substantially as long as a length of the screen bar segment." The shape including a plurality of rollers is not straight, and the individual rollers do not have a length substantially as long as a length of the screen bar segment. Therefore, the rejection of claim 9 should be withdrawn. Claims 10 and 13 are dependent on claim 9, and are not anticipated by Insalaco for at least the same reasons.

Further claim 10 should be separately patentable. Claim 10 requires that, "step (d) is performed by moving the insertion member in a single motion normal to the plane of the ventilation cloth." Insalaco fails to disclose or suggest this feature. Insalaco's groove runs along the sides of the frame. Insalaco teaches use of rollers that are aligned in, or parallel to, a plane of the ventilation cloth. While loading a new frame, the rollers can be moved away from the frame in a plane parallel to the plane of the ventilation cloth. Insalaco does not suggest that insertion is performed by moving the insertion member in a single motion **normal** to the plane of the ventilation cloth. Insalaco's in-plane motion is the antithesis of the normal motion required by claim 10. Therefore, the rejection of claim 10 should be withdrawn.

Claims 1, 4, 5 and 8 were rejected under 35 U.S.C. § 102(b) as being anticipated by Sekiraku (JP 63-180519). Claim 1 is amended. The clause, "providing adhesive in said at least one of the segments," is deleted because it was unnecessary in view of the recitation of adhesive on at least one of the segments in step (a). Claim 1 is also amended to require, "clamping all the segments simultaneously with a plurality of separately positionable clamping arms." The separately positionable clamping arms allow a single fixture to be adjusted to accommodate a variety of different frame sizes. Further, by clamping all the segments simultaneously, the speed of fabrication is greater than in a sequential clamping operation.

Applicants enclose herewith a full translation of Sekiraku. Sekiraku neither discloses nor suggests "clamping all the segments simultaneously with a plurality of separately positionable clamping arms." Sekiraku teaches a "positioning jig" which is "constructed to have curvature," so that, "the inside screen member (3) with coated adhesive will make contact with the pasting surface of the door (B) **sequentially** from one end to the other." [emphasis added]. There is no suggestion in Sekiraku of a plurality of separately positionable clamping arms. Sekikaru's positioning jig is not adjustable, and cannot be readily repositioned for inserting a ventilation cloth to a frame having a different size. Moreover, since Sekiraku fails to suggest simultaneous clamping, and teaches that his positioning jig is curved to insert the screen **sequentially** in a rocking motion, Sekiraku teaches away from clamping all the segments simultaneously, as required by claim 1.

Therefore, amended claim 1 is not anticipated by Sekiraku. Claims 4, 5 and 8 are dependent on claim 1, and are not anticipated by Sekiraku for at least the same reasons as claim 1.

Claims 2 and 3 were rejected under 35 U.S.C. § 103 as being unpatentable over Sekiraku in view of La Tarte, Insalaco and Takaoka (JP 5-309821). Claim 3 is amended to depend directly from claim 1, and claim 2 is amended to depend on claim 3. In addition to the features of claim 1, amended claim 3 further requires, "simultaneously inserting the ventilation cloth in the adhesive substantially across an entire length of each of the segments." The features of claim 1 are not disclosed or suggested by Sekiraku, as discussed above. The combined teachings of Le Tarte, Insalaco and Takaoka fails to cure the deficiency of Sekiraku. None of the references suggests a method for simultaneously inserting the ventilation cloth in the adhesive substantially across an entire length of each of the segments. Le Tarte uses a roller that rolls sequentially along each side of the frame. The cloth is inserted into one end of a segment later than the other end of the same segment. Le Tarte does not suggest simultaneously inserting the ventilation cloth in the adhesive substantially across an entire length of one segment, much less each of the segments as required by claim 3. Insalaco uses a plurality of rollers at various locations along two opposite sides of the frame, as the frame travels in a first direction along the table. As

shown in FIG. 4, when the frame reaches the corner of the table, the frame changes direction, to a second direction perpendicular to the first direction. While the frame moves in the second direction, a second set of rollers inserts the cloth in the other set of sides. Insalaco's technique cannot be applied to insert cloth along each of the segments simultaneously, because putting rollers in front of the frame would prevent the frame from moving forward. Takaoka was cited for teaching use of heat to melt the adhesive. However, Takaoka fails to cure the deficiency of the other references. Takaoka teaches use of a roller that sequentially moves along a length of a screen bar member, and does not simultaneously insert the cloth substantially across an entire length of one segment, much less each of the segments.

Therefore, the combined teachings of Sekiraku, Insalaco, Le Tarte and Takaoka fail to disclose or suggest the features of claim 3. Withdrawal of the rejection is respectfully requested.

Claims 7 and 8 were rejected under 35 U.S.C. § 103 as being unpatentable over Sekiraku in view of Insalaco. Claim 7 is amended to recite, "the frame is pre-bowed outward before the clamping step, and the clamping step includes compressing the frame inward from the outside on all four sides, so that the ventilation cloth is tensioned when the clamping is discontinued" The combined teachings of Sekiraku and Insalaco fail to disclose or suggest the features of amended claim 7.

Claim 8 is dependent on claim 5. The deficiency of Sekiraku with respect to claim 5 is described above. Insalaco fails to cure the deficiency of Sekiraku with respect to claims 1 and 5. The combined teachings of Sekiraku and Insalaco fail to disclose or suggest "clamping all the segments simultaneously with a plurality of separately positionable clamping arms," as required by claim 1. Insalaco's technique cannot be applied to clamp each of the segments simultaneously, because clamping the front segment of the frame would prevent the frame from moving forward, and Insalaco's method requires the forward motion to insert the cloth across the length of the segments. Therefore, claim 8 is neither disclosed not suggested by the combined teachings of Sekiraku and Insalaco.

In view of the foregoing amendments and remarks, Applicant submits that this application is in condition for allowance. Early notification to that effect is respectfully requested.

The Assistant Commissioner for Patents is hereby authorized to charge any additional fees or credit any excess payment that may be associated with this communication to deposit account **04-1679.**

Respectfully submitted,

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Steven E. Koffs, Reg. No.: 37,163
Attorney For Applicants

DUANE MORRIS LLP
One Liberty Place
Philadelphia, Pennsylvania 19103-7396
(215) 979-1250 (Telephone)
(215) 979-1020 (Fax)